

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT
STATE OF OKLAHOMA

FILED

AUG 26 2022

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

1) JARED F. COLLINS,
Plaintiff,

v.

1) BOARD OF COUNTY
COMMISSIONERS OF NOWATA
COUNTY,
Defendant.

Case No. **22 CV - 375 GKF - SH**

**ATTORNEY'S LIEN CLAIMED
JURY TRIAL DEMANDED**

COMPLAINT

COMES NOW Plaintiff, Jared F. Collins, and for this his claim and cause of action
against the Defendant, Nowata County, State of Oklahoma, states as follows:

I

This court has jurisdiction of the parties and the subject matter of this action by
virtue of 42 U.S.C. § 12101, as amended. 28 U.S.C. § 1331.

II

At all times material hereto Plaintiff was a disabled employee of the Defendant.
Throughout his employment Plaintiff was subject to discrimination based on this
disability and endured a hostile work environment as a result of Defendant's negligent
and/or reckless and/or willful acts and omissions. Ultimately, Defendant terminated
Plaintiff's employment based on his disability and after he had made complaints to the
Equal Employment Opportunity Commission.

1 Summary
fee pd

III

As a result, Plaintiff has lost wages, endured emotional distress, and has otherwise been damaged.

IV

Plaintiff received his Notice of Right to Sue from the United States Equal Employment Opportunity Commission (EEOC) and this action timely commences.

WHEREFORE, premises considered, Plaintiff prays for judgment against the Defendant for actual and punitive damages in a sum in excess of One Million Dollars (\$1,000,000.00), attorney's fees and expenses, all costs of this action, and injunctive relief and such other relief to which he may be deemed entitled.

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

By:



Frank W Frasier, OBA #17864
Steven R. Hickman, OBA #4172
Maureen M. Johnson, OBA #21750
1700 Southwest Boulevard
Tulsa, OK 74107-1730
(918) 584-4724
(800) 522-4049
(918) 583-5637 fax
frasier@tulsa.com e-mail